

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OFFICE OF SECRETARY

In the Matter of)
)
Implementation of the Local)
Competition Provisions in the)
Telecommunications Act of 1996)

CC Docket No. 96-98

DOCKET FILE COPY ORIGINAL

**SUPPLEMENTAL COMMENTS OF
SOUTHWESTERN BELL TELEPHONE COMPANY**

Southwestern Bell Telephone Company (SWBT), by its attorneys, respectfully files these Supplemental Comments in response to the Commission's June 20, 1996 and June 25, 1996 Public Notices (Numbers DA 96-1007 and DA 96-1030, respectively), regarding the Commission's June 17, 1996 News Release (Report No. CC 96-13) on an economic model of the telecommunications industry developed by Commission staff in this proceeding. The model is referred to as the "Industry Demand and Supply Simulation" (IDSS) model.

At the outset SWBT notes that the Commission's first issuance on this matter, the June 17, 1996 News Release, specifically stated: "[t]he presence or absence of any particular option or variable [in the IDSS model] should not be interpreted as a Commission decision or a proposed Commission decision."¹ Since the Commission has placed the public on notice that it specifically is not proposing the use of the IDSS model, or any aspect thereof, as a basis of any decision to be made in this proceeding, SWBT

¹ Report No. CC 96-13, p. 1 (emphasis added).

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presumes that the model indeed will not serve as the basis for any such Commission decision.

In light of the above express Commission disclaimer, if at some point in the future the Commission should decide to base any of its decisions in this proceeding upon some use of the IDSS model, it should give public notice of that intent and allow comment by any interested parties at that point in light of the significantly altered posture of the model as regards Commission decision-making in this docket. Otherwise, a Commission order based on any aspect of the IDSS model would run afoul of the notice and comment requirements of the Administrative Procedures Act. Nevertheless, SWBT opts to provide comments on the model at this point, as requested by the Commission, to help shape the Commission's thinking on whether and how the model might be modified so as to be of some valid use in decision-making herein, after appropriate public notice.

In analyzing the effectiveness of any economic model, it is critical to know what data is being simulated and the intended purpose of the simulation. A model which forecasts the general economy, for example, may predict values for the unemployment rate or the Gross Domestic Product (GDP). In evaluating the reasonableness of such a model, a researcher would try to determine whether the forecasts for the unemployment rate and GDP were valid. One cannot determine from the information within the IDSS model exactly what data is being projected, much less the efficacy of the

projections.

Further, in preparing an economic simulation, an analyst first creates a stylized view of reality, or a "theory." From this theory, the modeler then creates a series of equations which capture the linkages which he/she assumes occur in the economy. One needs to know how the creators of the IDSS model believe that the telecommunications market operates in order to evaluate the effectiveness of the model, and that information is completely unavailable from the model released publicly by the Commission.

As with the model's theory, a series of assumptions is also of necessity included within any such economic model. These assumptions -- which may be as fundamental as a forecast of inflation or future tax rates -- may have a significant effect on the items being projected. Even if a model is theoretically valid, a given set of assumptions may undermine forecasts produced by the simulation if the assumptions are not factually sound. Thus far, interested parties have been given virtually no idea as to what assumptions formed the basis of the IDSS model.

The effectiveness of a model is also influenced by the data used in the simulation. It may be that data in one portion of the model conflicts with that used in another portion of the simulation (e.g., flat-rate versus measured-rate service). A catalogue of all data sources used to create the IDSS model would be necessary for any outside party to accurately assess its validity, and no such information has been released to the public

along with the IDSS model.

In order for any party to make an accurate, meaningful evaluation of the IDSS model's usefulness, interested parties would have to know, at a minimum, the following things:

(1) Statement of basic operation and use - To analyze any economic model, an overview must be provided that describes the basic operation of the model and the intended use of the output. Analogous to cost studies, if one inquires whether a cost study is valid, the answer hinges upon the intended purpose of the cost study. The actual validity of the IDSS model can only be determined once the public is able to understand what question(s) the model is attempting to answer.

(2) Description of data sources and their values - Any use of input values must be identified and cited. A reasoned analysis requires an audit of the data sources or at least some form of confirmation as to their accuracy.

(3) A process description - A detailed description of calculation processes and the flow of these processes is needed to allow for accurate analysis of the IDSS model. Without such description and flow chart, it is quite difficult to debug the program logic.

(4) A description of the algorithms used - A listing of all algorithms utilized in such a model is essential for debugging purposes.

(5) Summaries of test runs - Parties attempting to analyze the IDSS model require output from sample runs of the program with plausible test data and an analysis of the sensitivity of the model to input changes. Sensitivity to data input is critical to determining whether an economic model is valid across reasonably varying input data.

Despite the absence of the above essential information regarding the IDSS model, Dr. William E. Taylor of National Economic Research Associates, Inc. (NERA) has managed to produce an excellent overall critique of the IDSS model (based upon a set of reasonable assumptions), in the form of his affidavit attached to

the Comments of the United States Telephone Association (USTA) to be filed in this matter. SWBT wholly supports the observations made by Dr. Taylor therein, and urges the Commission to account for them fully in its decision regarding whether and how to utilize the IDSS model for any decision-making purpose in CC Docket No. 96-98, after appropriate public notice to that effect.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Liz Jensen, hereby certify that the foregoing Supplemental Comments of Southwestern Bell Telephone Company, in Docket 96-98, have been served this 8th day of July, 1996 to the Parties of Record.

Liz Jensen

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